



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SR-6J

968740

May 17, 2021

John Wolski
Senior Remediation Manager
Raytheon Technologies - Corporate Remediation
9 Farm Springs Road
Farmington, CT 06032

**Subject: *Review of Draft Quality Assurance Project Plan (QAPP) Addendum -01
Hamilton Sundstrand Corporation (HSC)
Area 9/10 Southeast Rockford Groundwater Contamination Superfund Site
Rockford, Illinois***

Dear Mr. Wolski:

U.S. Environmental Protection Agency (EPA) has reviewed the above titled QAPP dated February 2021 prepared by AECOM on behalf of HSC for the Southeast Rockford Groundwater Contamination Superfund Site, Source Area 9/10 in Rockford, Illinois. Specific comments on items included in the addendum are below; however, EPA is requesting that a full QAPP revision be submitted instead of an addendum as the original QAPP for remedial action is from 2008 and the last addendum from 2014.

In addition to addressing the comments below, the QAPP needs to be resubmitted and revised as a complete document (all worksheets and associated content, all field and lab standard operating procedures (SOPs), in Uniform Federal Policy (UFP)-QAPP format¹) rather than an addendum. This follows regional and divisional policy and procedures.

Specific Comments

1. QAPP Worksheet #3 & #5: Project Organization and QAPP Distribution
 - Update to the current EPA RPM and QA reviewer (also, Sections 2.1, 2.7).
 - Organization Chart – define what the solid line represents and what the broken line represents.
2. QAPP Worksheet #14 & #16: Project Tasks and Schedule
 - Add clarification that 1,4-dioxane will be collected at all monitoring stations with the same frequency as established monitoring. If this is not accurate, describe the monitoring plan for 1,4-dioxane.
3. QAPP Worksheet #15: Project Action Limits and Laboratory-Specific Detection/Quantitation Limits (Appendix C)
 - The project specific reporting limit for 1,4-dioxane on page 9 is 0.4 ug/L. The laboratory SOP lists their reporting limit (RL) as 130 ug/L for water matrix samples. This needs to be reconciled. What are the project specific measurement objectives for this analyte and can this laboratory

¹ Guidance available at: <https://www.epa.gov/fedfac/assuring-quality-federal-cleanups>

meet them? Screening/action levels must be documented for 1,4-dioxane. The former is normally 0.46 µg/L².

- There are two tables on page 9. No method is listed for the volatiles. Add this information. The method is assumed to be 8260D.

4. QAPP Worksheet #23: Analytical SOPs

- Provide accreditation records for the 8260D method and analytes.

If you have any questions, please call me at (312) 886-7153.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Knoepfle". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Jennifer Knoepfle, Ph.D., P.G.
Remedial Project Manager

cc (via electronic mail):

Brian Conrath, Project Manager, IEPA

Jon Alberg, Senior Principal, AECOM

Peter Hollantz, Project Manager, AECOM

² Regional Tap Water Screening Levels <https://semspub.epa.gov/work/HQ/200055.pdf>